

# ANNEX B

## Corporate Responses

The research presented in "Until Nothing is Left" was drawn from publicly available sources or bills of lading available by subscription, which allowed the researchers to identify **risk** in corporate supply chains linked to the XPCC. All of the companies outside of China that are named in the report are downstream of companies that have sourced products made by the XPCC or warehouse XPCC cotton, which increases the downstream companies' exposure to forced labor.

All companies named in "Until Nothing is Left" were emailed to provide them the opportunity to contribute to the report findings. (Some emails bounced back and additional email addresses were attempted where available.) The research team invited Chinese companies to explain their relationship to the labor transfer programs and asked downstream corporations to indicate any relationship they have to the XPCC or labor transfer schemes and to describe efforts they have made to exclude Xinjiang products from supply chains. The research team cannot independently verify these claims, but we allowed companies an opportunity to address the risk identified in our research.

Below are the responses received to date. These responses will be updated as new information is received.

Last Updated: December 6, 2022

**Conagra**

**July 6, 2022**

The research team simply asked Conagra to clarify its current relationship with Chalkis Health, as it has held a joint venture with the company. After the response below, we asked for further information regarding the disposition of the joint venture, but we received none.

Hello Laura,

Conagra does not have any ownership of this business.

Regards,

Dan

**Asian Development Bank**

**August 16, 2022**

Dear Laura

Many thanks for your query. We note that you published your report on 11 August but some of the information you cited concerning the size and proportion of XBRB contracts was not accurate. The ADB data library <https://data.adb.org/dataset/operational-procurement-database> has a list of goods, works, and consulting services contracts awarded for projects approved by ADB 2017-2022. But for convenience, I am attaching an Excel file listing over the last 10 years 23 contracts from 13 projects in five developing member countries (AFG, CAM, PAK, PRC, TAJ) for XPCC and Xinjiang Beixin Road and Bridge Group Co. Ltd. (of which the controlling stake is owned by XPCC).

Six contracts are currently active and 17 contracts have been already been completed as detailed in the attached Excel file. There has been no subcontracting under awarded contracts.

Please note also that in projects that ADB finances, ADB does not contract directly with companies but rather they are contracted by the executing or implementing agencies of the country concerned.

All ADB financed and administered projects are screened and assessed for environmental and social safeguards following the requirements of ADB's Safeguard Policy Statement, 2009. ADB monitors all projects for safeguards consistent with environmental

and social management plans and legal agreements for the projects. Safeguard documents are available online through the project data sheets for the respective projects.

Regards

**Graham Dwyer**

Principal Communications Specialist  
Asian Development Bank

Attached spreadsheet:

PRODUCT TYPE	CONTRACT YEAR	BORROWING COUNTRY	PRODUCT STATUS	PROJECT TITLE	CONTRACTOR NAME	CONTRACT DESCRIPTION
LOAN	2012	China, People's Republic of	Closed	XINJIANG ALTAY URBAN INFRAS. & ENVIRONMENT IMPROVEMENT PROJECT	XINJIANG PRODUCTION AND CONSTRUCTION CORPS CONSTRUCTION ENGINEERING (GROUP) CO. LTD.	HABAHE COUNTY HEATING - CENTRAL HEATING WORKS (HEATING PIPE NETWORK & HEAT EXCHANGE STATION)
GRANT	2012	Tajikistan	Closed	CAREC CORRIDOR 6 (AYNI-UZBEKISTAN BORDER ROAD) IMPROVEMENT PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	AYNI-UZBEKISTAN BORDER ROAD UPGRADING WORKS (CONTRACT NO. 1)
LOAN	2013	Pakistan	Closed	FLOOD EMERGENCY RECONSTRUCTION PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	REHABILITATION OF RANIPUR ROHRI NORTH BOND (N-5), PACKAGE-1, KM 412 TO KM440
LOAN	2013	Pakistan	Closed	FLOOD EMERGENCY RECONSTRUCTION PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	REHABILITATION OF RANIPUR-ROHRI NORTH BOUND ROAD (N-5), PACKAGE-II, KM 440 TO KM 475

LOAN	2013	Pakistan	Closed	FLOOD EMERGENCY RECONSTRUCTION PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	REHABILITATION OF KOHALA MUZAFARABAD ROAD (S-2) PACKAGE-1, KM 00 TO KM 20
GRANT	2013	Afghanistan	Closed	MFF:TRANSPORT NETWORK DEVELOPMENT INVESTMENT PROGRAM-TRANCHE 2	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	RECONSTRUCTION & REHAB OF KABUL TO JALALABAD HIGH WAY SAPARY (KM 50+0000) TO SURHKROAD (KM 156+0000)
LOAN	2013	China, People's Republic of	Closed	FORESTRY & ECOLOGICALRESTORATI ON PRJ IN THREE NORTHWEST PROVINCES	XINJIANG PRODUCTION AND CONSTRUCTION CORPS CONSTRUCTION ENGINEERING (GROUP) CO. LTD.	CJ083: INDUSTRIAL PARK & VILLAGE-CHANGJI, XINJIANG
LOAN	2013	China, People's Republic of	Closed	FORESTRY & ECOLOGICALRESTORATI ON PRJ IN THREE NORTHWEST PROVINCES	XINJIANG PRODUCTION AND CONSTRUCTION CORPS CONSTRUCTION ENGINEERING (GROUP) CO. LTD.	CJ085: IRS SANGONG BEACH- CHANGJI, XINJIANG
LOAN	2014	China, People's Republic of	Closed	FORESTRY & ECOLOGICALRESTORATI ON PRJ IN THREE NORTHWEST PROVINCES	XINJIANG PRODUCTION AND CONSTRUCTION CORPS CONSTRUCTION ENGINEERING (GROUP) CO. LTD.	HJ023- HEJING ROAD ENGINEERING
GRANT	2015	Tajikistan	Closed	CAREC CORRIDOR 6 (AYNI-UZBEKISTAN BORDER ROAD)	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	RURAL ROADS REPAIRING IN AYNI REGION

				IMPROVEMENT PROJECT		
GRANT	2015	Tajikistan	Closed	CAREC CORRIDOR 6 (AYNI-UZBEKISTAN BORDER ROAD) IMPROVEMENT PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	RURAL ROADS REPAIRING IN PANJAKENT CITY
LOAN	2015	Cambodia	Closed	FLOOD DAMAGE EMERGENCY RECONSTRUCTION PROJECT-ADDITIONAL FINANCING	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	MRD-CW16A.REHAB15.5KMOF1ROAD&CONCRETE PAVEMENT3.736KM &STRUCTURES IN BANTEAY MEANCHHEY(BC1-OU CHROV/NR5-CHANGHAR,BC2-MONGKOL BOREY-NR5-KHLA KHAM CHHKAE
LOAN	2015	Cambodia	Closed	FLOOD DAMAGE EMERGENCY RECONSTRUCTION PROJECT-ADDITIONAL FINANCING	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	STAGE 3, MRD-CW13B. EMER. RECONSTRUCTION OF 21.8KM OF 4 RURAL ROADS AND CONCRETE PAV 8.16KM AND ROAD STRUCTURES IN KG. CHAM.
GRANT	2015	Pakistan	Closed	NATIONAL MOTORWAY M-4 GOJRA-SHORKOT SECTION PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	ICB-M4-IIA GOJRA-JAMANI SECTION (31 KM)
LOAN						
GRANT	2016	Cambodia	Closed	RURAL ROADS IMPROVEMENT PROJECT II	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD. & BENG MENG GROUP CO. LTD. (JV)	CW1 IMPROVEMENT OF 9 ROADS 193.9 KM UNDER OUTPUT AND PERFORMANCE-BASED CONTRACT (TBOUNG KHMUM)
LOAN			Active			
LOAN	2016	Pakistan	Closed	NATIONAL MOTORWAY M-4 GOJRA-SHORKOT-KHANEWAL SEC PROJ-ADDT'L FINA	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	DINPUR-SHAMKOT (KHANEWAL) SECTION-ICB-M4-IIIB
GRANT						

LOAN	2016	Pakistan	Active	SINDH PROVINCIAL ROAD IMPROVEMENT PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	ICB-SPRIP-06: DIGRI TO NAUKOT (54 KM)
LOAN	2016	Pakistan	Active	SINDH PROVINCIAL ROAD IMPROVEMENT PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	ICB-SPRIP-04: SANGHAR TO MIRPURKHAS (63 KM)
LOAN	2016	Pakistan	Active	SINDH PROVINCIAL ROAD IMPROVEMENT PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD.	ICB-SPRIP-03: KHYBER TO SANGHAR (64 KM)
GRANT	2017	Tajikistan	Closed	CAREC CORRIDORS 2,5 & 6(DUSHANBE-KURGONTEPPA) ROAD PROJECT	XINJIANG BEIXIN ROAD AND BRIDGE GROUP CO. LTD	REHABILITATION AND IMPROVEMENT OF THE DUSHANBE- KURGONTEPPA ROAD, FROM KM 0+275 TO KM 33+475
LOAN			Active			
LOAN	2018	Pakistan	Active	MFF: CAREC CORRIDOR DEVELOPMENT INVESTMENT PROGRAM-TRANCHE 1	XINJIANG BEIXIN ROAD & BRIDGE GROUP CO. LTD.	CONSTRUCTION OF ADDITIONAL 2-LANE CARRIAGEWAY FROMPETARO-SEHWAN N-55 (SECTION 2) KM64+000-KM130+370 (66.37 KM)
LOAN	2019	China, People's Republic of	closed	XINJIANG TACHENG BORDER CITIES AND COUNTIES DEVELOPMENT PROJECT	XINJIANG BEIXIN ROAD & BRIDGE GROUP CO.,LTD.	TARBAGATAI ROAD NORTH
LOAN	2020	China, People's Republic of	closed	YUNNAN PU'ER REGIONAL INTEGRATED ROAD NETWORK DEVELOPMENT PROJECT	XINJIANG BEIXIN ROAD & BRIDGE GROUP CO., LTD.	CIVIL WORKS FOR PAVEMENT FOR NINGER-JIANGCHENG- LONGFU S245 CLASS III HIGHWAY NJL-PAV2

**November 24, 2022**

**[in response to a request for more information regarding how the ADB's list compares with the data retrieved from other public sources, following several exchanges to determine the most efficient way for ADB to report their information to SHU and a request for permission to share on SHU website (which was granted by email on November 30.)]**

Dear Laura

Our responses to your questions below have been compiled into the attached file.

Regards

**Graham Dwyer**

Principal Communications Specialist  
Asian Development Bank

Attached table:

Questions	Draft Answers																												
<p><b>Q1 First can you tell me if the projects we name are related to projects on your spreadsheet?</b> I name which ones I think are potential matches here.</p> <table border="0" data-bbox="218 483 1079 764"> <thead> <tr> <th data-bbox="218 483 625 516">Project We Name</th> <th data-bbox="625 483 1079 516">Potential match on your spreadsheet</th> </tr> </thead> <tbody> <tr> <td data-bbox="218 553 625 586">Dushanbe-Kurgan Tube Road</td> <td data-bbox="625 553 1079 586">11&amp; 12? 24&amp;25?</td> </tr> <tr> <td data-bbox="218 586 625 618">CW05 Highway Project</td> <td data-bbox="625 586 1079 618">17&amp;18?</td> </tr> <tr> <td data-bbox="218 618 625 651">Petaro-Sehwan Hwy Project</td> <td data-bbox="625 618 1079 651">15&amp;16? 19&amp;20? 21-23?</td> </tr> <tr> <td data-bbox="218 651 625 683">M-4 Gojra-Shorkot Section</td> <td data-bbox="625 651 1079 683">15&amp;16? 19&amp;20? 21-23?</td> </tr> <tr> <td data-bbox="218 683 625 716">M-4 Shorkot-Khanewal Section</td> <td data-bbox="625 683 1079 716">15&amp;16? 19&amp;20? 21-23?</td> </tr> <tr> <td data-bbox="218 716 625 748">Reconstruction Project..Sindh</td> <td data-bbox="625 716 1079 748">21-23?</td> </tr> </tbody> </table>	Project We Name	Potential match on your spreadsheet	Dushanbe-Kurgan Tube Road	11& 12? 24&25?	CW05 Highway Project	17&18?	Petaro-Sehwan Hwy Project	15&16? 19&20? 21-23?	M-4 Gojra-Shorkot Section	15&16? 19&20? 21-23?	M-4 Shorkot-Khanewal Section	15&16? 19&20? 21-23?	Reconstruction Project..Sindh	21-23?	<p>We are not able to confirm if all the projects in our list are identical with the projects you named, but “possible matches” with the projects in our list are below.</p> <table border="0" data-bbox="1079 483 1946 764"> <thead> <tr> <th data-bbox="1079 483 1499 516">Project (Our Name)</th> <th data-bbox="1499 483 1946 516">Potential match on your spreadsheet</th> </tr> </thead> <tbody> <tr> <td data-bbox="1079 553 1499 586">Dushanbe-Kurgan Tube Road</td> <td data-bbox="1499 553 1946 586">24/25</td> </tr> <tr> <td data-bbox="1079 586 1499 618">CW05 Highway Project</td> <td data-bbox="1499 586 1946 618">17/18</td> </tr> <tr> <td data-bbox="1079 618 1499 651">Petaro-Sehwan Hwy Project</td> <td data-bbox="1499 618 1946 651">26</td> </tr> <tr> <td data-bbox="1079 651 1499 683">M-4 Gojra-Shorkot Section</td> <td data-bbox="1499 651 1946 683">15/16</td> </tr> <tr> <td data-bbox="1079 683 1499 716">M-4 Shorkot-Khanewal Section</td> <td data-bbox="1499 683 1946 716">19/20</td> </tr> <tr> <td data-bbox="1079 716 1499 748">Reconstruction Project..Sindh</td> <td data-bbox="1499 716 1946 748">21/23</td> </tr> </tbody> </table>	Project (Our Name)	Potential match on your spreadsheet	Dushanbe-Kurgan Tube Road	24/25	CW05 Highway Project	17/18	Petaro-Sehwan Hwy Project	26	M-4 Gojra-Shorkot Section	15/16	M-4 Shorkot-Khanewal Section	19/20	Reconstruction Project..Sindh	21/23
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<p><b>Q2 Project we name that does not seem to appear on your list.</b> Can you tell me if they are under a different name on your list or if ADB didn't fund the project?</p> <p>Kabal to Jalalabad Highway Project (this was cancelled, so maybe it was removed?)</p>	<p>This project was planned for processing (indicative approval date June 2022) but is now cancelled since ADB operations in Afghanistan are on hold until further notice.</p>																												
<p><b>Q3 Projects that do not seem to be on our list (we start in 2015).</b> Can you tell me if I'm correct or if they're related to something we did name?</p> <p>13&amp;14 Cambodia Flood Damage  24&amp;25 Tajikistan Carec Corridors  26 Pakistan MFF CAREC Corridor Development  27 China Xinjiang Tacheng Border Cities  28 China Yunnan Pu'er Region</p>	<p>Again, we are not able to confirm if the projects in our list are identical with the projects you named. But, considering the project titles and the countries, the projects you named and those in our list are a possible match.</p>																												
<p><b>Q4</b> Can you tell us why 27 and 28 were closed?</p>	<p><b>27 = Xinjiang Tacheng Border Cities and Counties</b></p>																												



Questions	Draft Answers
	<p>The project was completed by 30 June 2022.</p> <p>Please see project data sheet for more information <a href="https://www.adb.org/projects/46063-002/main">https://www.adb.org/projects/46063-002/main</a></p> <p><b>28 = Yunnan Pu'er Integrated Regional Roads</b></p> <p>The project was completed on 30 June 2022 .</p> <p>Please see the project data sheet for more information <a href="https://www.adb.org/projects/46040-003/main">https://www.adb.org/projects/46040-003/main</a></p>
<p><b>Q5</b> In 2019 and 2020, was there any additional due diligence conducted re: "development" aspects of this project?</p>	<p>For (i) Xinjiang Tacheng Border Cities, a physical review mission was conducted in November/December 2019 followed by virtual review missions in December 2020 and October 2021, (ii) Yunnan Pu'er Integrated Regional Roads, a physical review mission was conducted in November 2019 followed by virtual review missions in September 2020, and November 2021 since COVID-19 travel restrictions did not allow for physical visits during those two years.</p>
<p><b>Q6</b> Border regions road building -- what was it for?</p>	<p>The project was approved in 2015 to meet urgent needs in urban infrastructure and municipal services, improve the environment, social inclusiveness, and border trade capacity of Tacheng City and the county cities of Emin, Tuoli, and Yumin.</p> <p>Please refer to the project data sheet <a href="https://www.adb.org/projects/46063-002/main">https://www.adb.org/projects/46063-002/main</a> and associated attachments for full details of the activities undertaken.</p>
<p><b>Q7</b> What did they do to ensure that it was in line with PSs (performance standards) or other protections?</p>	<p>ADB's involvement in projects requires the project executing agencies comply with ADB policies on procurement as well as environmental and social safeguards. Development plans were prepared for each project (accessible in the project link in Q4). These plans assess project impacts in a culturally appropriate and gender-sensitive manner to ensure ethnic minorities benefit equally from a project, are fully</p>

Questions	Draft Answers
	<p>included in project communication and implementation, and are able to voice their concerns and needs. Such plans are monitored closely during project implementation to ensure strict compliance with ADB policies requirements.</p>
<p><b>Q8</b> Were there any concerns at that time about collaborating with the XPCC?</p>	<p>The contracts were processed in line with ADB's controls and requirements at the time, including and not limited to eligibility criteria as set forth in the Procurement Regulations and policies. ADB followed the obligations in relation to the United Nations Security Council Sanctions and ADB Sanctions [including MDB cross debarments as recognized by the Agreement for Mutual Enforcement of Debarment Decisions <a href="#">Agreement for Mutual Enforcement of Debarment Decisions (adb.org)</a>]</p>
<p><b>Q9</b> Does ADB have any new policies re: funding projects of the XPCC/Beixin?</p>	<p>ADB has strengthened its procurement controls for all sovereign operations, as outlined in the ADB <a href="#">User Guide for Procurement of Works (adb.org)</a> and associated documents (e.g., <a href="https://www.adb.org/documents/procurement-large-works-guide">https://www.adb.org/documents/procurement-large-works-guide</a>). These include requirements for declarations relating to the bidding firm, joint venture partners, associates, parent company, and affiliates or subsidiaries, including any subcontractors, consultants, subconsultants, manufacturers, service providers, suppliers, key officers, directors, and key personnel regarding and not limited to:</p>

Questions	Draft Answers
	<ul style="list-style-type: none"> <li>• conflicts of interest,</li> <li>• subject to a debarment from a multilateral development bank including ADB,</li> <li>• subject to an undergoing investigation and/or sanctions proceedings by ADB or any multilateral development bank,</li> <li>• temporarily suspended, debarred, declared ineligible, or subject to any national and/or international sanctions by any country, any international organization, any multilateral development bank and other donor agency,</li> <li>• charged or convicted with any criminal offense (including felonies but excluding misdemeanors) or infractions and/or violations of ordinance;</li> <li>• charged or found liable in any civil or administrative proceedings in the last 10 years;</li> <li>• undergoing investigation for such, or subject to any criminal, civil or administrative orders, monitorship or enforcement actions;</li> <li>• can make and receive electronic fund transfer payments through the international banking system or otherwise discharge the Employer's obligation upon initiation of wire transfer; and</li> <li>• not from a country which is prohibited to export goods or services to, or receive any payments from the Employer's country and/or are not prohibited to receive payments for particular goods or services by the Employer's country by an act of compliance with a decision of the United Nations Security Council taken under Chapter VII of the Charter of the United Nations</li> </ul> <p>Additionally, ADB has been improving its internal sanctions control framework, aimed at (i) managing legal, fiduciary, and operational risks arising from national sanctions regimes; and (ii) ensuring that a party that is under ADB or United Nations (UN)</p>

Questions	Draft Answers
	Security Council sanctions is not engaged by ADB or in ADB-financed operations, as outlined in pages 9 and 17 of the <a href="#">Office of Anticorruption and Integrity 2021 Annual Report (adb.org)</a> and <a href="#">ADB Annual Report 2021 (page 58 ADB Annual Report 2021 Toward a Green and Inclusive Recovery)</a>
Does ADB have any new policies re funding projects in Xinjiang in general now?	There are no ADB projects in Xinjiang under preparation.

INTERNAL. This information is accessible to ADB Management and staff. It may be shared outside ADB with appropriate permission.